

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**Case No. 3:23-md-3071  
MDL No. 3071**

**JURY DEMAND**

**Chief Judge Waverly D. Crenshaw, Jr.**

**This Document Relates to:**

**3:22-cv-01082  
3:23-cv-00332  
3:23-cv-00357  
3:23-cv-00378  
3:23-cv-00410  
3:23-cv-00413  
3:23-cv-00552  
3:23-cv-00742  
3:23-cv-00979**

**DEFENDANTS' NOTICE CONCERNING PRIVILEGE LOGGING DISPUTE IN**  
**DRAFT ESI PROTOCOL**

On February 13, 2024, the Court held a telephonic conference with the Parties. During this conference the Court requested that the parties submit additional information regarding their dispute over the privilege logging requirements contained in the ESI Protocol. Defendants propose that the parties be required to prepare only one log entry for a single, wholly privileged email chain. Plaintiffs would have the parties prepare a privilege log entry for every constituent email of such a string.

Plaintiffs are incorrect to suggest that logging a wholly-privileged email chain in a single line on a privilege log would somehow hide non-privileged and responsive documents from Plaintiffs. If a non-privileged email in an email chain is responsive to an agreed-upon or court-ordered document request, Defendants will produce that email. However, if all emails in an email

chain are privileged, Defendants should be able to list that email chain or email in a single line on their privilege log.

By way of example, under Defendants' proposal, if a leasing manager at Defendant Windsor Property Management Company ("Windsor") asks an in-house attorney for legal advice on revisions to a leasing agreement and the attorney and leasing manager discuss that advice in a series of 10 emails, Windsor would not need to log all 10 emails as separate entries on its privilege log. Instead, Windsor would list the entire email chain in a single entry on its privilege log. *See* Ex. A (example of privileged email string); Ex. B (example of privilege logs for same email under defendants' proposed language and plaintiffs' proposed language). If Plaintiffs believe that the privilege log entry for that email chain is over-inclusive or not sufficiently descriptive, they could request that Windsor log each email in the chain and each attachment in the email chain separately in a supplemental privilege log. The same rules would apply to Plaintiffs. For example, if a Plaintiff had an extended email discussion with counsel over, that Plaintiff would not need to separately log each back and forth email but could list the entire email chain in a single entry on its privilege log.

The parties have already agreed that responsive emails should be produced as threads containing the most-inclusive version of each email sent and received in a chain of emails. Plaintiffs have not explained why they should depart from such an approach here.

This approach avoids unnecessary burdens in drafting privilege logs while giving Plaintiffs the information necessary to evaluate claims of privilege. *See, e.g.*, The Sedona Principles, Third Edition: Best Practices, Recommendations & Principles for Addressing Electronic Document Production, 19 Sedona Conf. J. 1, Cmt. 10.h (2018) ("Logging large volumes of withheld ESI is often costly, burdensome, time-consuming, and disproportionate to the needs of the case."); *United*

*States v. Davita, Inc.*, 301 F.R.D. 676, 685 (N.D. Ga. 2014) (“[T]he Court is concerned with the potential of massive amounts of duplication. A typical email string may exist in multiple different forms as more and more communications are added. . . . The Court does not intend that [an] email [chain] be logged ten separate times, which in this case might turn Defendants’ 250 pages of logs into 2,500 pages with little added benefit.”). The Court should adopt Defendants’ proposed language concerning privilege logging.

Dated: February 14, 2024

/s/ Jay Srinivasan

Jay Srinivasan (admitted *pro hac vice*)  
jsrinivasan@gibsondunn.com  
Daniel G. Swanson (admitted *pro hac vice*)  
dswanson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: (213) 229-7430

Stephen Weissman (admitted *pro hac vice*)  
sweissman@gibsondunn.com  
Michael J. Perry (admitted *pro hac vice*)  
mjerry@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Telephone: (202) 955-8678

S. Christopher Whittaker (admitted *pro hac vice*)  
cwhittaker@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1361 Michelson Drive  
Irvine, CA 92612  
Telephone: (212) 351-2671

Ben A. Sherwood (admitted *pro hac vice*)  
bsherwood@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 351-2671

Thomas H. Dundon (SBN: 004539)  
tdundon@nealharwell.com  
Neal & Harwell, PLC  
1201 Demonbreun Street, Suite 1000  
Nashville, TN 37203  
Telephone: (615) 244-1713

*Counsel for Defendant RealPage, Inc.*

/s/ Edwin Buffmire

Edwin Buffmire  
ebuffmire@jw.com  
Michael Moran  
mmoran@jw.com  
JACKSON WALKER LLP  
2323 Ross Ave., Suite 600  
Dallas, TX 75201  
Telephone: (214) 953-6000

Kevin Fulton  
kevin@fultonlg.com  
THE FULTON LAW GROUP PLLC  
7676 Hillmont St., Suite 191  
Houston, TX 77040  
Telephone: (713) 589-6964

*Counsel for Defendant Allied Orion Group, LLC*

/s/ Danny David

Danny David  
danny.david@bakerbotts.com  
BAKER BOTTS LLP  
910 Louisiana Street  
Houston, TX 77002  
Telephone: (713) 229-4055

James Kress (*pro hac vice* forthcoming)  
james.kress@bakerbotts.com  
Paul Cuomo (*pro hac vice* forthcoming)  
paul.cuomo@bakerbotts.com  
BAKER BOTTS LLP  
700 K. Street, NW  
Washington, DC 20001  
Telephone: (202) 639-7884

John R. Jacobson (#14365)  
jjacobson@rjfirm.com  
Milton S. McGee, III (#24150)  
tmcgee@rjfirm.com  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203  
Telephone: (615) 320-3700

*Counsel for Defendant Avenue5 Residential,  
LLC*

/s/ Ian Simmons

Ian Simmons  
isimmons@omm.com  
Patrick Jones  
pjones@omm.com  
O'MELVENY & MYERS LLP  
1625 Eye Street, NW  
Washington, DC 20006  
Telephone: (202) 383-5196

Stephen McIntyre  
smcintyre@omm.com  
O'MELVENY & MYERS LLP  
400 South Hope Street, 18th Floor  
Los Angeles, CA 90071  
Telephone: (213) 430-6000

*Counsel for Defendant BH Management  
Services, LLC*

/s/ Marguerite Willis

Marguerite Willis (admitted *pro hac vice*)  
mwillis@maynardnexsen.com  
MAYNARD NEXSEN PC  
104 South Main Street  
Greenville, SC 29601  
Telephone: (864) 370-2211

Michael A. Parente (admitted *pro hac vice*)  
mparente@maynardnexsen.com  
MAYNARD NEXSEN PC  
1230 Main Street, Suite 700  
Columbia, SC 29201  
Telephone: (803) 771-8900

Margaret M. Siller (BPR No. 039058)  
msiller@maynardnexsen.com  
MAYNARD NEXSEN PC  
1131 4th Avenue South, Suite 320  
Nashville, Tennessee 37210  
Telephone: (629) 258-2253

*Counsel for Defendant Bell Partners, Inc.*

/s/ Edwin Buffmire

Edwin Buffmire  
ebuffmire@jw.com  
Michael Moran  
mmoran@jw.com  
JACKSON WALKER LLP  
2323 Ross Ave., Suite 600  
Dallas, TX 75201  
Telephone: (214) 953-6000

*Counsel for Defendants Trammell Crow  
Residential Company and Crow Holdings, LP*

/s/ James D. Bragdon

James D. Bragdon  
jbragdon@gejlaw.com  
Sam Cowin  
scowin@gejlaw.com  
GALLAGHER EVELIUS & JONES LLP  
218 N. Charles St., Suite 400  
Baltimore, MD 21201  
Telephone: (410) 727-7702

Philip A. Giordano (admitted *pro hac vice*)  
philip.giordano@hugheshubbard.com  
HUGHES HUBBARD & REED LLP  
1775 I Street NW  
Washington, DC 20007  
Telephone: (202) 721-4776

Charles E. Elder, BPR # 038250  
celder@bradley.com  
BRADLEY ARANTBOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
P: 615.252.3597

*Counsel for Defendant  
Bozzuto Management Company*

/s/ Yehudah L. Buchweitz

Yehudah L. Buchweitz  
yehudah.buchweitz@weil.com  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, NY 10153  
Telephone: (212) 310-8256

Jeff L. White  
jeff.white@weil.com  
WEIL, GOTSHAL & MANGES LLP  
2001 M Street, NW  
Washington, DC 20036  
Telephone: (202) 682-7059

/s/ E. Steele Clayton IV

E. Steele Clayton IV (BPR 017298)  
sclayton@bassberry.com  
Jeremy A. Gunn (BPR 039803)  
jeremy.gunn@bassberry.com  
Bass, Berry & Sims PLC  
150 Third Avenue South, Suite 2800  
Nashville, TN 37201  
Telephone (615) 742-6200  
Facsimile (615) 742-6293

*Counsel for Defendant Brookfield Properties  
Multifamily LLC*

/s/ Danielle R. Foley

Danielle R. Foley (admitted *pro hac vice*)  
drfoley@venable.com  
Andrew B. Dickson (admitted *pro have vice*)  
abdickson@venable.com  
VENABLE LLP  
600 Massachusetts Avenue, NW  
Washington, D.C. 20001  
(202) 344-4300

*Counsel for Defendant CH Real Estate  
Services, LLC*

/s/ Benjamin R. Nagin

Benjamin R. Nagin  
bnagin@sidley.com  
SIDLEY AUSTIN LLP  
787 Seventh Avenue  
New York, NY 10019  
Telephone: (212) 839-5300

*Counsel for Defendant ConAm Management  
Corporation*

/s/ Bradley C. Weber

Bradley C. Weber (admitted *pro hac vice*)  
bweber@lockelord.com  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, TX 75201  
Telephone: (214) 740-8497

*Counsel for Defendant Dayrise Residential,  
LLC*

/s/ Lynn H. Murray

Lynn H. Murray  
lhmmurray@shb.com  
Maveric Ray Searle  
msearle@shb.com  
SHOOK, HARDY & BACON L.L.P.  
111 S. Wacker Dr., Suite 4700  
Chicago, IL 60606  
Telephone: (312) 704-7766

Ryan Sandrock  
rsandrock@shb.com  
Shook, Hardy & Bacon L.L.P.  
555 Mission Street, Suite 2300  
San Francisco, CA 94105  
Telephone: (415) 544-1944

Laurie A. Novion  
lnovion@shb.com  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Blvd.  
Kansas City, MO 64108  
Telephone: (816) 559-2352

*Counsel for Defendant Camden Property Trust*

/s/ Todd R. Seelman

Todd R. Seelman  
todd.seelman@lewisbrisbois.com  
Thomas L. Dyer  
thomas.dyer@lewisbrisbois.com  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
1700 Lincoln Street, Suite 4000  
Denver, CO 80203  
Telephone: (720) 292-2002

*Counsel for Defendant Cortland Management,  
LLC*



/s/ Ann MacDonald

Ann MacDonald  
Ann.macdonald@afslaw.com  
Barry Hyman  
Barry.hyman@afslaw.com  
ARENTFOX SCHIFF LLP  
233 South Wacker Drive, Suite 7100  
Chicago, IL 60606  
Telephone: (312) 258-5500

*Counsel for Defendant CWS Apartment Homes,  
LLC*

/s/ Charles H. Samel

Charles H. Samel  
charles.samel@stoel.com  
Edward C. Duckers  
ed.duckers@stoel.com  
STOEL RIVES LLP  
1 Montgomery Street, Suite 3230  
San Francisco, CA 94104  
Telephone: (415) 617-8900

George A. Guthrie  
gguthrie@wilkefleury.com  
WILKE FLEURY LLP  
621 Capitol Mall, Suite 900  
Sacramento, CA 95814  
Telephone: (916) 441-2430

*Counsel for Defendant FPI Management, Inc.*

/s/ Carl W. Hittinger

Carl W. Hittinger  
chittinger@bakerlaw.com  
Alyse F. Stach  
astach@bakerlaw.com  
Tyson Y. Herrold  
therrold@bakerlaw.com  
BAKER & HOSTETLER LLP  
1735 Market Street, Suite 3300  
Philadelphia, PA 19103-7501  
Telephone: (215) 568-3100

Stephen J. Zralek, BPR #018971  
szralek@spencerfane.com  
S. Chase Fann, BPR #036794  
cfann@spencerfane.com  
SPENCER FANE LLP  
511 Union Street, Suite 1000  
Nashville, TN 37219  
Telephone: (615) 238-6300

*Counsel for Defendant Equity Residential*

/s/ Michael D. Bonanno

Michael D. Bonanno (admitted *pro hac vice*)  
mikebonanno@quinnemanuel.com  
QUINN EMANUEL URQUHART & SULLIVAN LLP  
1300 I St. NW, Suite 900  
Washington, DC 20005  
Telephone: (202) 538-8225

Christopher Daniel Kercher (admitted *pro hac vice*)  
christopherkercher@quinnemanuel.com  
QUINN EMANUEL URQUHART & SULLIVAN LLP  
51 Madison Avenue, 22nd Floor,  
New York, New York 10010  
Telephone: (212) 849-7000

Andrew Gardella, Esq. (TN Bar #027247)  
agardella@martintate.com  
MARTIN, TATE, MORROW & MARSTON P.C.  
315 Deaderick Street, Suite 1550  
Nashville, TN 37238  
Telephone: (615) 627-0668

*Counsel for Defendant Highmark Residential,  
LLC*

/s/ Cliff A. Wade

Cliff A. Wade  
cliff.wade@bakerlopez.com  
Chelsea L. Futrell  
chelsea.futrell@bakerlopez.com  
BAKER LOPEZ PLLC  
5728 LBJ Freeway, Suite 150  
Dallas, Texas 75240  
Telephone: (469) 206-9384

*Counsel for Defendant Knightvest Residential*

/s/ Leo D. Caseria

Leo D. Caseria  
lcaseria@sheppardmullin.com  
Helen C. Eckert  
heckert@sheppardmullin.com  
SHEPPARD MULLIN RICHTER & HAMPTON LLP  
2099 Pennsylvania Avenue, NW, Suite 100  
Washington, DC, 20006  
Telephone: (202) 747-1925

Arman Oruc  
aoruc@goodwinlaw.com  
GOODWIN PROCTER, LLP  
1900 N Street, NW  
Washington, DC 20036  
Telephone: (202) 346-4000

*Counsel for Defendant Essex Property Trust,  
Inc.*

/s/ Gregory J. Casas

Gregory J. Casas (admitted *pro hac vice*)  
casasg@gtlaw.com  
Emily W. Collins (admitted *pro hac vice*)  
Emily.Collins@gtlaw.com  
GREENBERG TRAURIG, LLP  
300 West 6th Street, Suite 2050  
Austin, TX 78701-4052  
Telephone: (512) 320-7200

Robert J. Herrington (admitted *pro hac vice*)  
Robert.Herrington@gtlaw.com  
GREENBERG TRAURIG, LLP  
1840 Century Park East, Suite 1900  
Los Angeles, CA 90067  
Telephone: (310) 586-7700

Becky L. Caruso (admitted *pro hac vice*)  
Becky.Caruso@gtlaw.com  
GREENBERG TRAURIG, LLP  
500 Campus Drive, Suite 400  
Florham Park, NJ 07932  
Telephone: (973) 443-3252

/s/ Ryan T. Holt

Ryan T. Holt (No. 30191)  
rholt@srvhlaw.com  
Mark Alexander Carver (No. 36754)  
acarver@srvhlaw.com  
SHERRARD ROE VOIGT & HARBISON, PLC  
150 Third Avenue South, Suite 1100  
Nashville, Tennessee 37201  
Tel. (615) 742-4200

*Counsel for Defendant Lincoln Property  
Company*

/s/ John J. Sullivan

John J. Sullivan (admitted *pro hac vice*)  
jsullivan@cozen.com  
COZEN O'CONNOR P.C.  
3 WTC, 175 Greenwich St., 55th Floor  
New York, NY 10007  
Telephone: (212) 453-3729

Molly Rucki (admitted *pro hac vice*)  
mrucki@cozen.com  
COZEN O'CONNOR P.C.  
1200 19th St. NW, Suite 300  
Washington, DC 20036  
Telephone: (202) 912-4884

*Counsel for Defendant Independence Realty  
Trust, Inc.*

/s/ Eliot Turner

Eliot Turner  
eliot.turner@nortonrosefulbright.com  
NORTON ROSE FULBRIGHT US LLP  
1301 McKinney, Suite 5100,  
Houston, Texas 77010  
Telephone: (713) 651-5151

*Counsel for Defendant Kairoi Management,  
LLC*

/s/ Michael W. Scarborough

Michael W. Scarborough (admitted *pro hac vice*)

mscarborough@velaw.com

Dylan I. Ballard (admitted *pro hac vice*)

dballard@velaw.com

VINSON & ELKINS LLP

555 Mission Street, Suite 2000

San Francisco, CA 94105

Telephone: (415) 979-6900

*Counsel for Defendant Lantower Luxury Living, LLC*

/s/ Michael M. Maddigan

Michael M. Maddigan

michael.maddigan@hoganlovells.com

HOGAN LOVELLS US LLP

1999 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Telephone: (310) 785-4727

William L. Monts, III

william.monts@hoganlovells.com

Benjamin F. Holt

benjamin.holt@hoganlovells.com

HOGAN LOVELLS US LLP

555 Thirteenth Street, NW

Washington, DC 20004

Telephone: (202) 637-6440

Joshua C. Cumby (BPR No. 37949)

joshua.cumby@arlaw.com

F. Laurens Brock (BPR No. 17666)

larry.brock@arlaw.com

Rocklan W. King, III (BPR No. 30643)

rocky.king@arlaw.com

ADAMS AND REESE LLP

1600 West End Avenue, Suite 1400

Nashville, TN 37203

Telephone: (615) 259-1450

Karen Hoffman Lent (admitted *pro hac vice*)

Karen.lent@skadden.com

Boris Bershteyn (admitted *pro hac vice*)

Boris.bershteyn@skadden.com

Evan Kreiner (admitted *pro hac vice*)

Evan.Kreiner@skadden.com

Sam Auld (admitted *pro hac vice*)

Sam.Auld@skadden.com

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

One Manhattan West

New York, NY 10001

Telephone: (212) 735-3000

*Counsel for Defendant Greystar Management Services, LLC*

/s/ Britt M. Miller

Britt M. Miller (admitted *pro hac vice*)  
bmiller@mayerbrown.com  
Daniel T. Fenske (admitted *pro hac vice*)  
dfenske@mayerbrown.com  
Matthew D. Provance (admitted *pro hac vice*)  
mprovance@mayerbrown.com  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 6006  
Telephone: (312) 701-8663

Scott D. Carey (#15406)  
scarey@bakerdonelson.com  
Ryan P. Loofbourrow (#33414)  
rloofbourrow@bakerdonelson.com  
BAKER, DONELSON, BEARMAN, CALDWELL &  
BERKOWITZ, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, TN 37203  
Telephone: (615) 726-5600

*Counsel for Defendants Mid-America  
Apartment Communities, Inc. and Mid-America  
Apartments, L.P.*

/s/ Jeffrey C. Bank

Jeffrey C. Bank  
jbank@wsgr.com  
WILSON SONSINI GOODRICH & ROSATI PC  
1700 K Street NW, Fifth Floor  
Washington, DC 20006  
Telephone: (202) 973-8800

*Counsel for Defendant Morgan Properties  
Management Company, LLC*

/s/ Richard P. Sybert

Richard P. Sybert (WSBA No. 8357)  
rsybert@grsm.com  
GORDON REES SCULLY MANSUKHANI  
701 Fifth Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 321-5222

*Counsel for Defendant First Communities  
Management, Inc.*

/s/ Jose Dino Vasquez

Jose Dino Vasquez  
dvasquez@karrtuttle.com  
Jason Hoeft  
jhoeft@karrtuttle.com  
KARR TUTTLE CAMPBELL  
701 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Telephone: (206) 223-1313

*Counsel for Defendant Security Properties  
Residential, LLC*

/s/ David A. Walton

David A. Walton  
dwalton@bellnunnally.com  
Troy Lee (T.J.) Hales  
thales@bellnunnally.com  
BELL NUNNALLY & MARTIN, LLP  
2323 Ross Avenue, Suite 1900  
Dallas, TX 75201

*Counsel for Defendant RPM Living, LLC*

/s/ Diane R. Hazel

Diane R. Hazel  
dhazel@foley.com  
FOLEY & LARDNER LLP  
1400 16th Street, Suite 200  
Denver, CO 80202  
Telephone: (720) 437-2000

Elizabeth A. N. Haas (admitted *pro hac vice*)  
ehaas@foley.com  
Ian Hampton (admitted *pro hac vice*)  
ihampton@foley.com  
FOLEY & LARDNER LLP  
777 East Wisconsin Avenue  
Milwaukee, WI 53202  
Telephone: (414) 271-2400

Tara L. Swafford, BPR #17577  
tara@swaffordlawfirm.com  
Dylan Harper, BPR #36820  
dylan@swaffordlawfirm.com  
THE SWAFFORD LAW FIRM, PLLC  
321 Billingsly Court, Suite 19  
Franklin, Tennessee 37067  
Telephone: (615) 599-8406

*Counsel for Defendant Sherman Associates,  
Inc.*

/s/ Brent Justus

Brent Justus  
bjustus@mcguirewoods.com  
Nick Giles  
ngiles@mcguirewoods.com  
MCGUIREWOODS LLP  
800 East Canal Street  
Richmond, VA 23219-3916  
Telephone: (804) 775-1000

*Counsel for Defendant Simpson Property  
Group, LLC*

/s/ Yonaton Rosenzweig

Yonaton Rosenzweig  
yonirosenzweig@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
865 S. Figueroa Street, Suite 2400  
Los Angeles, CA 90017

Fred B. Burnside  
fredburnside@dwt.com  
MaryAnn T. Almeida  
maryannalmeida@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Telephone: (206) 757-8016

*Counsel for Defendant Mission Rock  
Residential, LLC*

/s/ Andrew Harris

Andrew Harris  
Andrew.Harris@Levittboccio.com  
LEVITT & BOCCIO, LLP  
423 West 55th Street  
New York, NY 10019  
Telephone: (212) 801-1104

/s/ Nicholas A. Gravante, Jr.

Nicholas A. Gravante, Jr. (admitted *pro hac vice*)  
nicholas.gravante@cwt.com  
Philip J. Iovieno (admitted *pro hac vice*)  
philp.iovieno@cwt.com  
CADWALADER, WICKERSHAM & TAFT LLP  
200 Liberty Street  
New York, NY 10281  
Telephone: (212) 504-6000

Georgia Winston (admitted *pro hac vice*)  
gwinston@wmhlaw.com  
JACKSON LEWIS, P.C.  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, NY 10281  
Telephone: (212) 335-2972

*Counsel for Defendants The Related  
Companies, L.P. and Related Management  
Company, L.P.*

/s/ Benjamin I. VandenBerghe

Benjamin I. VandenBerghe  
biv@montgomerypurdue.com  
Kaya R. Lurie  
klurie@montgomerypurdue.com  
MONTGOMERY PURDUE PLLC  
701 Fifth Avenue, Suite 5500  
Seattle, Washington 98104-7096

*Counsel for Defendant Thrive Communities  
Management, LLC*



/s/ David D. Cross

David D. Cross (admitted *pro hac vice*)  
dcross@mofo.com  
Jeffrey A. Jaeckel (admitted *pro hac vice*)  
jjaeckel@mofo.com  
Robert W. Manoso (admitted *pro hac vice*)  
rmanoso@mofo.com  
MORRISON & FOERSTER LLP  
2100 L Street, NW, Suite 900  
Washington, D.C., 20037  
Telephone: (202) 887-1500

Eliot A. Adelson (admitted *pro hac vice*)  
eadelson@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105  
Telephone: (415) 268-7000

Mika M. Fitzgerald (admitted *pro hac vice*)  
mfitzgerald@mofo.com  
MORRISON & FOERSTER LLP  
250 W 55th Street  
New York, NY 10019  
Telephone: (212) 468-8000

/s/ Joshua L. Burgener

Joshua L. Burgener  
jburgener@dickinsonwright.com  
DICKINSON WRIGHT PLLC  
424 Church Street, Suite 800  
Nashville, TN 37219  
Telephone: (615) 620-1757

*Counsel for Defendant UDR, Inc.*

/s/ Stephen M. Medlock

Jessalyn H. Zeigler  
jzeigler@bassberry.com  
BASS, BERRY & SIMS, PLC  
150 Third Avenue South  
Suite 2800  
Nashville, TN 37201  
Telephone: (615) 742-6200

Craig P. Seebald (admitted *pro hac vice*)  
cseebald@velaw.com  
Stephen M. Medlock (admitted *pro hac vice*)  
smedlock@velaw.com  
Michael S. McCambridge (admitted *pro hac vice*)  
mmccambridge@velaw.com  
VINSON & ELKINS LLP  
2200 Pennsylvania Ave., N.W.  
Suite 500 West  
Washington, D.C. 20037  
Telephone: (202) 639-6500

Christopher W. James (admitted *pro hac vice*)  
cjames@velaw.com  
VINSON & ELKINS LLP  
555 Mission Street  
Suite 2000  
San Francisco, CA 94105  
Telephone: (415) 979-6900

*Counsel for Defendant Windsor Property  
Management Company*

/s/ Matt T. Adamson

Matt T. Adamson  
madamson@jpcclaw.com  
JAMESON PEPPE CANTU PLLC  
801 Second Avenue, Suite 700  
Seattle, WA 98104  
Telephone: (206) 292-1994

*Counsel for Defendant B/T Washington, LLC  
d/b/a Blanton Turner*

/s/ Evan Fray-Witzer

Evan Fray-Witzer  
Evan@CFWLegal.com  
CIAMPA FRAY-WITZER, LLP  
20 Park Plaza, Suite 505  
Boston, MA 02116  
Telephone: 617-426-0000

*Counsel for Defendants WinnCompanies LLC,  
and WinnResidential Manager Corp.*

/s/ Ferdose al-Taie

Ferdose al-Taie (admitted *pro hac vice*)  
faltaie@bakerdonelson.com  
BAKER, DONELSON, BEARMAN CALDWELL &  
BERKOWITZ, P.C.  
956 Sherry Lane, 20th Floor  
Dallas, TX 75225  
Telephone: (214) 391-7210

Christopher E. Thorsen (BPR # 21049)  
cthorsen@bakerdonelson.com  
BAKER, DONELSON, BEARMAN CALDWELL &  
BERKOWITZ, P.C.  
Baker Donelson Center, Suite 800  
211 Commerce Street  
Nashville, TN 37201  
Telephone: (615) 726-5600

*Counsel for Defendant ZRS Management, LLC*

/s/ Jeffrey S. Cashdan

Jeffrey S. Cashdan (admitted *pro hac vice*)  
jcashdan@kslaw.com  
Emily S. Newton (admitted *pro hac vice*)  
enewton@kslaw.com  
Lohr A. Beck (admitted *pro hac vice*)  
lohr.beck@kslaw.com  
Carley H. Thompson (admitted *pro hac vice*)  
chthompson@kslaw.com  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: (404) 572-4600

*Counsel for Defendant ECI Management, LLC*

/s/ James H. Mutchnik

James H. Mutchnik  
james.mutchnik@kirkland.com  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000

*Counsel for Defendants Thoma Bravo L.P.,  
Thoma Bravo Fund XIII, L.P., and Thoma  
Bravo Fund XIV, L.P.*

/s/ Sarah B. Miller

Sarah B. Miller (TN#33441)  
BASS, BERRY & SIMS PLC  
150 Third Ave. South #2800  
Nashville, TN 37201  
Telephone: (615) 742-6200  
smiller@bassberry.com

Amy F. Sorenson (admitted *pro hac vice*)  
SNELL & WILMER, L.L.P.  
15 West South Temple, Ste. 1200  
Salt Lake City, UT 84101  
Telephone: (801) 257-1900  
asorenson@swlaw.com

Colin P. Ahler (admitted *pro hac vice*)  
SNELL & WILMER, L.L.P.  
One East Washington St., Ste. 2700  
Phoenix, AZ 85004  
Telephone: (602) 382-6000  
cahler@swlaw.com

*Counsel for Defendant Apartment Management  
Consultants, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 14, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Stephen M. Medlock

Stephen M. Medlock